

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO PUBLIC REPRESENTATIVE INSTITUTIONAL INTERROGATORIES
PR/USPS-18, 19, AND 22 THROUGH 24**

The United States Postal Service hereby provides institutional responses to the above-listed interrogatories of the Public Representative filed September 9, 2011. Each interrogatory is stated verbatim and followed by the response. Responses to PR/USPS 20 and 21 are forthcoming.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE PUBLIC REPRESENTATIVE**

PR/USPS-18

Please confirm that the following post offices are listed in USPS-LR-2, but not included in USPS-LR-12:

		Name	Facility	City	State	
1	2584	NANTUCKET STATION 1		STATION	NANTUCKET	MA
2	22304	THEOLOGICAL SEMINARY		FND_S	ALEXANDRIA	VA
3	22433	BURR HILL		MAIN_PO	BURR HILL	VA
4	22451	DOGUE		MAIN_PO	DOGUE	VA
5	22513	MERRY POINT		MAIN_PO	MERRY POINT	VA
6	22523	MORATTICO		MAIN_PO	MORATTICO	VA
7	22529	OLDHAMS		MAIN_PO	OLDHAMS	VA
8	22548	SHARPS		MAIN_PO	SHARPS	VA
9	22552	SPARTA		MAIN_PO	SPARTA	VA
10	22577	SANDY POINT		MAIN_PO	SANDY POINT	VA
11	22723	HOOD		MAIN_PO	HOOD	VA
12	22738	ROCHELLE		MAIN_PO	ROCHELLE	VA
13	22743	SYRIA		MAIN_PO	SYRIA	VA
14	22748	WOLFTOWN		MAIN_PO	WOLFTOWN	VA
15	22820	CRIDERS		MAIN_PO	CRIDERS	VA
16	22845	ORKNEY SPRINGS		MAIN_PO	ORKNEY SPRINGS	VA
17	22957	MONTPELIER STATION		MAIN_PO	MONTPELIER STATION	VA
18	23064	GRIMSTEAD		MAIN_PO	GRIMSTEAD	VA
19	23105	MANNBORO		MAIN_PO	MANNBORO	VA
20	23125	NEW POINT		MAIN_PO	NEW POINT	VA
21	23126	NEWTOWN		MAIN_PO	NEWTOWN	VA
22	23130	ONEMO		MAIN_PO	ONEMO	VA
23	23147	RUTHVILLE		MAIN_PO	RUTHVILLE	VA
24	23154	SCHLEY		MAIN_PO	SCHLEY	VA
25	23219	CAPITOL		FIN_S	RICHMOND	VA
26	23220	SAUNDERS		FIN_S	RICHMOND	VA
27	23222	NORTHSIDE		FIN_S	RICHMOND	VA
28	23223	EAST END		STATION	RICHMOND	VA
29	23224	SOUTHSIDE		STATION	RICHMOND	VA
30	23241	CENTRAL RICHMOND		STATION	RICHMOND	VA
31	23302	ASSAWOMAN		MAIN_PO	ASSAWOMAN	VA
32	23341	CRADDOCKVILLE		MAIN_PO	CRADDOCKVIL LE	VA
33	23389	HARBORTON		MAIN_PO	HARBORTON	VA
34	23404	LOCUSTVILLE		MAIN_PO	LOCUSTVILLE	VA

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35	23408	MARIONVILLE	MAIN_PO	MARIONVILLE	VA
36	23426	SANFORD	MAIN_PO	SANFORD	VA
37	23427	SAXIS	MAIN_PO	SAXIS	VA
38	23443	TOWNSEND	MAIN_PO	TOWNSEND	VA
39	23486	WILLIS WHARF	MAIN_PO	WILLIS WHARF	VA
40	23488	WITHAMS	MAIN_PO	WITHAMS	VA

RESPONSE

Confirmed.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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PR/USPS-19

Please provide ZIP Code information for the following Atlanta GA Post Offices listed in USPS-LR-12:

District	Name Office	Fac ID	State	Near Office	Near Miles
Atlanta	Cascade		GA	Ben Hill Sta	4.5
Atlanta	Lakewood		GA	E Atlanta Sta.	5.6
Atlanta	Northlake		GA	Briarcliff Sta	4.0
Atlanta	Peachtree Center		GA	Civic Center Sta	0.9
Atlanta	Phoenix		GA	Central City Sta	1.0
Atlanta	West End		GA	Morris Brown Sta	1.9

RESPONSE

30311	Atlanta Cascade
30331	Ben Hill Sta
30315	Atlanta Lakewood
30316	East Atlanta Sta
31145	Atlanta Northlake
30345	Briarcliff Station
30343	Atlanta Peachtree Center
30308	Civic Center Sta
30301	Atlanta Phoenix
30303	Central City Station
30310	Atlanta West End
30314	Morris Brown Station

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE PUBLIC REPRESENTATIVE

PR/USPS-22

Please discuss how the USPS-LR-1 handbook process requires the discontinuance team to:

- a. Identify if the facility under review is currently co-located with a BMEU?
- b. Isolate the revenue and costs associated with the BMEU?
- c. Evaluate the potential revenue loss associated with moving the BMEU?
- d. Solicit comments from mailers who use the BMEU regarding the effect of moving the BMEU?

RESPONSE

- (a) Such information is routinely noted despite the absence of an explicit instruction.
- (b) When *total* operating expenses and *total* revenue are calculated for a facility, they would include any associated with operation of a BMEU at that facility, should one exist, without being isolated.
- (c) As is the case with retail revenue, the discontinuance review process does not include the development of estimates of potential lost commercial revenue.
- (d) Irrespective of the presence of a BMEU, USPS Handbook PO-101 section 222.g requires that potentially affected bulk entry customers be identified for notification:

The district Bulk Mail Entry Unit (BMEU) provides a listing of permit mailers from the *PostalOne!* system. Additionally, the district BMEU should identify any drop shipment customers that may be affected by discontinuance.

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PR/USPS-23

In Library Reference Nonpublic 3, the Postal Service provided operating cost and operating revenue data for over 30000 postal retail locations.

- a. How many offices had Operating Revenue that exceeded Operating Cost in FY2010?
- b. How many RAO offices had Operating Revenue that exceeded Operating Cost in FY2010?
- c. If the Discontinuance study reveals that the office is, in fact, operating at a profit, how will that impact your evaluation of whether that post office should close?

RESPONSE

- (a) There were 5,512 postal retail facilities (at which total operating expenses and total revenue are tracked separately) where the revenues exceeded expenses in FY 2010.
- (b) Among RAO candidate facilities for which the Postal Service separately tracks total operating expenses and operating revenue, total operating revenue exceeded total operating expenses at 258 locations in FY 2010.
- (c) Whether total operating expense exceeds operating revenue (or vice versa) is not a dispositive factor in discontinuance determinations.

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PR/USPS-24

USPS-LR-NP3 contains information regarding post office operating costs and revenues.

- a. How many post offices within the Albuquerque district are listed in USPS-LR-NP3?
- b. How many post offices are in the Albuquerque district?

RESPONSE

(a-b) 54 of the 314 Post Offices in the District meet the criteria for review under the RAO Initiative.